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8  
9 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

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11 ALLYSSA TEFFT, INDIVIDUALLY AND  
12 AS THE NATURAL PARENT OF  
13 BROOKLYNN McNAIR TEFFT, A MINOR,

14 Plaintiffs,

15 vs.

16 STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY; DOES 1 through  
17 10; inclusive and ROE CORPORATIONS 1  
through 10, inclusive,

18 Defendants.

Case No.: 2:23-cv-00520-JAD-DJA

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES**

**[THIRD REQUEST]**

19  
20 Pursuant to LR 6-1 and LR 26-3, the parties, by and through their respective counsel of  
21 record, hereby stipulate and request that this Court extend discovery in the above-captioned case by  
22 sixty (60) days, up to and including *Friday, August 9, 2024*. In addition, the parties request that all  
23 other future deadlines contemplated by the Discovery Plan and Scheduling Order be extended  
24 pursuant to Local Rule. This is the parties third request to extend discovery. In support of this  
25 Stipulation and Request, the parties state as follows:

26 **DISCOVERY COMPLETED**

27 1. On June 8, 2023, Defendant State Farm Mutual Automobile Insurance Company  
28 served their Initial Disclosures Pursuant to FRCP 26.1, their First Set of Requests for Production of

1 Documents to Plaintiff, their First Set of Requests for Admissions to Plaintiff, and their first set of  
2 Interrogatories to Plaintiff.

3 2. On June 15, 2023, Plaintiff filed their Initial Disclosures of Witnesses and Production  
4 of Documents Pursuant to FRCP 26.1.

5 3. On June 26, 2023, Plaintiff Tefft served their Responses to Defendant's Requests  
6 for Admission.

7 4. On July 10, 2023, Plaintiff Tefft served their Responses to Defendant's  
8 Interrogatories, and their Responses to Defendant's Request for Production of Documents.

9 5. On August 22, 2023, Defendant SFMAIC served their First Supplement to FRCP 26  
10 List of Witnesses and Documents.

11 6. On August 30, 2023, Plaintiff Tefft served their First Supplemental Disclosure of  
12 Witnesses and Documents Pursuant to FRCP 26.1.

13 7. On September 13, 2023, the deposition of Angela Vendetti, Claims Representative  
14 for SFMAIC took place.

15 8. On September 15, 2023, Plaintiff Tefft served their Request for Production of  
16 Documents to SFMAIC.

17 9. On September 15, 2023, Defendant SFMAIC served their Second Supplement to  
18 FRCP 26 List of Witnesses and Documents.

19 10. On September 18, 2023, Plaintiff Tefft served her first Request for Production of  
20 Documents to SFMAIC.

21 11. On September 25, 2023, Plaintiff Tefft served an Amended Notice of Taking the  
22 Videotaped Deposition of Lori Craig

23 12. On October 6, 2023, Plaintiff Tefft served the Notice of Taking the Videotaped  
24 Deposition of Sydney Payne.

25 13. On October 10, 2023, Defendant SFMAIC served their Amended Notice of Taking  
26 Deposition of Allyessa Tefft.

27 14. On October 19, 2023, Defendant SFMAIC served their Third Supplement to FRCP  
28 26 List of Witnesses and Documents.

15. On October 31, 2023, Defendant SFMAIC served their Notice of Vacating Deposition of Plaintiff Allyessa Tefft.

16. On November 1, 2023, Plaintiff Tefft served her Notice of Vacating the Videotaped Deposition of Lori Craig, and her Notice of Vacating the Videotaped Deposition of Sydney Payne.

17. On November 9, 2023, Defendant SFMAIC served their Fourth Supplement to FRCP

26 List of Witnesses and Documents

18. On November 14, 2023, Plaintiff Tefft served her Second Supplemental Disclosure of Witnesses and Production of Documents, Pursuant to FRCP 26.1.

19. On December 1, 2023, Plaintiff Tefft served her Amended Notice of Taking the Videotaped Deposition of Lori Craig.

20. On December 13, 2023, Defendant SFMAIC served their Fifth Supplement to FRCP

26 List of Witnesses and Documents.

**21. On January 9, 2024, Plaintiff Tefft served her Notice of Taking the Videotaped Deposition of Sydney Payne.**

**22. On January 12, 2024, Plaintiff Tefft served Plaintiff's Third Supplemental Disclosure of Witnesses and Production of Documents, Pursuant to FRCP 26.1.**

23. On January 16, 2024, the Deposition of SFMAIC employee Lori Craig was conducted.

**24. On January 18, 2024, Defendant SFMAIC served their Sixth Supplement to FRCP 26 List of Witnesses and Documents.**

**25. On January 22, 2024, Plaintiff Tefft served her Amended Notice of Taking the Videotaped Deposition of Sydney Payne.**

## DISCOVERY REMAINING

1. The parties will continue participating in written discovery.

2. Defendant will continue to collect Plaintiff's medical records.

3. SFMAIC will respond to Plaintiff Tefft's Request for Production, after the SFMAIC's Motion for Protective Order and Plaintiff Tefft's Counter-Motion to Compel are ruled upon.

4. Plaintiff will depose State Farm Employee Sydney Payne on April 11, 2024.

5. The deposition of Plaintiff Tefft will be noticed and taken.

6. Plaintiff will depose Defendant's FRCP 30(b)(6) witness(es).

7. The parties may depose any and all other witnesses garnered through discovery, potentially including treatment providers and claims adjusters.

8. The parties will designate expert witnesses and may conduct depositions of those expert witnesses.

9. Any and all remaining discovery required as permitted by the Federal Rules of Civil Procedure.

### **WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

The parties have been diligent in moving the case forward: participating in a reasonable amount of discovery, including exchanging their initial lists of witnesses and documents; supplemental lists of witnesses and documents, propounding written discovery requests and preparing responses thereto; taking the deposition of SFMAIC representatives Angela Vendetti and Lori Craig, records procurement; and preparing for Plaintiff's deposition.

The parties are asking for this extension as they are involved in motion practice related to Defendant SFMAIC's Motion for Protective Order and Plaintiff Tefft's Counter-Motion to Compel. Plaintiff has also moved out of state which have presented certain logistical issues. Further, one of the representatives of State Farm to be deposed, Sydney Payne, also lives out of state.

Both parties need additional time to gather expert witnesses in order to adequately try the case. This is the third request for an extension of time in this matter. The parties respectfully submit that the reasons set forth above constitute compelling reasons for the short extension.

The following is a list of the current discovery deadlines and the parties' proposed extended deadlines:

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	<i>Monday, June 10, 2024</i>	<i>Friday, August 9, 2024</i>
Amend Pleadings or Add Parties	<i>Closed.</i>	<i>Closed.</i>

Scheduled Event	Current Deadline	Proposed Deadline
Expert Disclosure pursuant to FRCP 26 (a)(2)	Wednesday, April 10, 2024	Monday, June 10, 2024
Rebuttal Expert Disclosure pursuant to FRCP. 26(a)(2)	Monday, May 13, 2024	Friday, July 12, 2024
Dispositive Motions	Tuesday, July 9, 2024	Monday, September 9, 2024
Pretrial Order	Thursday, August 8, 2024; or if dispositive motions are filed, 30 days after the entry of order on the dispositive motions.	Monday, October 7, 2024; or if dispositive motions are filed, 30 days after the entry of order on the dispositive motions.

WHEREFORE, the parties respectfully request that this Court extend the discovery period by Sixty (60) days from the current deadline of Monday June 10, 2024, up to and including Friday, August 9, 2024, and the other dates as outlined in accordance with the table above.

Dated this 20th day of March, 2024

Dated this 20th day of March, 2024

H&P LAW

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### **ORDER**

IT IS SO ORDERED.

DATED this 22nd day of March 2024.

  
UNITED STATES MAGISTRATE JUDGE